

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

ATTORNEY GENERAL'S THIRD SET OF DOCUMENT AND  
INFORMATION REQUESTS

D.T.E. 06-54

Respondent: Theodore Poe, Jr.

Date: September 28, 2006

Information Request AG-3-3

- Q. Refer to Exh. TEP-1, pages 13-14. Please explain how system pressure requirements are translated into peak-hour requirements. Provide all supporting documentation and calculations, including all Company policy, procedure and planning manuals, guidelines or reports related to maintaining pressure and the derivation and use of 5% peak hour requirement.
- A. System pressure requirements are not “translated into” or used as a driver for peak-hour requirements. Instead, the Company first identifies the system’s peak-hourly flow requirements for its customer load and then uses this information as inputs to the Advantica/SynerGEE<sup>®</sup> Model to determine the system pressures that will be needed to satisfy those peak-hour requirements on a reliable basis. This process, and the Company’s derivation of the 5% peak hour requirement, is discussed in detail in Exhibit KED-4, at pages 2-12 through 2-13.